

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN, *et al.*,

*Plaintiffs,*

v.

Civil Action No. 2:20-cv-64-LPL

TRANSPORTATION SECURITY  
ADMINISTRATION, *et al.*,

*Defendants.*

**JOINT MOTION FOR PROTECTIVE ORDER**

Plaintiffs and Government Defendants jointly move for entry of a protective order under which the Transportation Security Administration (TSA) would share with Plaintiffs' counsel Sensitive Security Information (SSI) designated pursuant to 49 U.S.C. § 114(r) and 49 C.F.R. Part 1520.

1. There is good cause to enter the protective order jointly proposed by Plaintiffs and the Government Defendants. Some of the documents responsive to Plaintiffs' discovery requests include such information, and TSA has determined that it is appropriate under 49 U.S.C. § 114(r) and 49 C.F.R. Part 1520 for Plaintiffs' counsel to receive access to this information.

2. The statutory protections afforded to SSI differ from the protections for sensitive law enforcement information that is encompassed by the Protective Order entered on September 1, 2021. Dkt. 91. For this reason, TSA's proposed protective order, to which Plaintiffs have agreed, sets out different terms for access to and use of SSI.

3. Accordingly, Plaintiffs and the Government Defendants respectfully request that the Court enter the attached proposed protective order.

Dated: February 2, 2022

/s/ Dan Alban (by permission)

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Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2022, a true and correct copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF System, which will send a notice of electronic filing to all counsel of record.

/s/ Galen N. Thorp